

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ONTARIO LOGAN-PATTERSON,

Plaintiff,

v.

Case No.: 3:24-cv-526

TRAVIS SCOTT WYATT,

Defendant.

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff Ontario Logan-Patterson, hereby submits his Initial Disclosures. Plaintiff's disclosures are made without waiving, in any way, the following: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper grounds, to use such information or documents for any purpose in whole or in part, in any subsequent proceeding in this action or any other action; (2) the right to object, on any grounds to the particular testimony of an individual; or (3) the right to object, on any and all grounds, at any time, to any other discovery request or proceeding involving or related to the subject matter of these disclosures.

All the disclosures set forth below are made subject to the above qualifications.

Plaintiff reserves the right to change, modify, supplement, or clarify the responses herein at any time before trial.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT PLAINTIFF MAY USE TO SUPPORT HIS CLAIM

The following are witnesses likely to have discoverable information that Plaintiff may use to support his claims in this matter (excepting those to be called solely for impeachment purposes):

1. Plaintiff Mr. Ontario Logan-Patterson

Contact Information: Plaintiff may be contacted through his counsel.

Mark Krudys, Esq.

Danny Zemel, Esq.

The Krudys Law Firm, PLC

919 East Main Street, Suite 2020

Richmond, VA 23219

Email: mkrudys@krudys.com; dzemel@krudys.com

2. Defendant in the instant matter, Travis Scott Wyatt

Defendant is expected to have knowledge as described in the Complaint (ECF No. 1).

Contact Information: Defendant may be contacted through his respective counsel.

Stanley W. Hammer (VSB No. 82181)

R. Cooper Vaughan (VSB No. 92580)

Assistant Attorneys General

Office of the Attorney General

202 North Ninth Street

Richmond, Virginia 23219

Telephone: (804) 200-4216

Facsimile: (804) 371-2087

shammer@oag.state.va.us

cvaughan@oag.state.va.us

3. All nondefendant persons/entities named/described in the Complaint. Expected to have knowledge as identified in the Complaint.

Ms. Lakita Patterson

Expected to have knowledge as described in the Complaint. Ms. Patterson, as described in the Complaint, was present at the time of the incident outlined in the Complaint.

Contact Information: Ms. Patterson may be contacted through Plaintiff's counsel.

Mark Krudys, Esq.

Danny Zemel, Esq.

The Krudys Law Firm, PLC

919 East Main Street, Suite 2020

Richmond, VA 23219

Email: mkrudys@krudys.com; dzemel@krudys.com

Hassan Shabazz

Expected to have knowledge as described in the Complaint. Mr. Shabazz is a family friend who obtained the Ring camera footage from Ms. Latrease Greene.

Contact Information:

804-908-5770

Shanequa Patterson

Expected to have knowledge as described in the Complaint. Ms. Patterson, Ontario's aunt, was present at the time of the incident, arriving at the scene approximately five minutes after Ontario was placed in the patrol car.

Contact information:

804-729-1179

Parres Price

Expected to have knowledge as described in the Complaint regarding Ontario's presence at the birthday party.

Contact information:

804-332-7028

Daldricka Price

Expected to have knowledge as described in the Complaint regarding Ontario's presence at the birthday party as his transportation to and from the party.

Contact information:

804-887-6126

Latoya Williams

Expected to have knowledge as described in the Complaint as Ontario's neighbor and witness to the incidents on December 11, 2024.

Contact information:

804-442-1243

Latrease Greene

Expected to have knowledge as described in the Complaint as owner of Ring camera footage.

Contact information:

316 E. 9th St.
Richmond, VA 23224
804-237-9233

4. All other Virginia State Police ("VSP") or Richmond Police Department ("RPD") employees identified in the records for Ontario (besides Defendant) and additional information as detailed in the Complaint. This includes, but is not limited to, the following persons:

State Trooper Lane

State Trooper Morrison

The foregoing identified persons are expected to have information identified in said documents.

Plaintiff also identifies all other troopers, police officers, dispatchers, and investigators who responded to the December 11, 2023 chase and/or search detailed in the Complaint.

Custodian of Records, Virginia State Police

The custodian is expected to have information authenticating the car-mounted and body camera video of the events outlined in the Complaint.

Contact Information: If still employed at VSP, the foregoing may be contacted through the following:

Superintendent Colonel Gary T. Settle (or current or acting
Superintendent)
Virginia State Police
7700 Midlothian Turnpike
North Chesterfield, VA 23235
(804) 674-2000

5. All persons and entities identified in Plaintiff's initial production in this matter. *See* OLP000001-OLP000058. Additionally, all persons and entities listed in Section II of this Disclosure.

“Zay” - The alleged name of the actual driver of the car pursued by the VSP. Likely to have information regarding the car pursuit, and circumstances preceding and following the pursuit.

Kylic Hakeem Cooper - One of the persons in the car pursued by the VSP. Likely to have information regarding the car pursuit, and circumstances preceding and following the pursuit.

Contact information:
4107 Mallard Landing Cir, Apt 101
Midlothian, VA 23112

Tasheen Baray - One of the persons in the car pursued by the VSP. Likely to have information regarding the car pursuit, and circumstances preceding and following the pursuit.

Contact information:

2101 Dresden Rd
Henrico, VA 23229

“Witness 3” - One of the persons in the car pursued by the VSP. Likely to have information regarding the car pursuit, and circumstances preceding and following the pursuit.

6. Commonwealth’s Attorney Colette McEachin and Assistant Commonwealth’s Attorney Stephanie A. Siegel, and possibly other members of their office. Expected to have the information identified in the Complaint.
7. Any and all persons identified in the Initial Disclosures of the Defendant and any amendments thereto.

Expected to have information as identified in Defense Disclosures, and otherwise, if applicable, as identified in the Complaint and/or documents/video/photos produced in the matter.

II. DOCUMENTS IN THE POSSESSION OF THE PLAINTIFF THAT PLAINTIFF MAY USE TO SUPPORT HIS CLAIM

Plaintiff hereby produces the following documents/video/photos in his possession, custody, or control that Plaintiff may use to support his claims (unless solely for impeachment).

The documents are produced herewith at OLP000001-OLP000058.

1. Video obtained from Ring camera on December 11, 2023.
2. Documents and videos obtained from VSP.
3. Photographs, videos, and location data from Plaintiff’s phone from December 11, 2023.

III. COMPUTATION OF DAMAGES

Ontario has suffered, and undoubtedly will continue to suffer, emotional harm, anxiety, distress, harm to his reputation, and necessary expenses.

Plaintiff's monetary claims are enumerated in detail in the Complaint. Plaintiff's claims are against the Defendant in an amount to be determined at trial and punitive damages in an amount to be determined at trial, costs, pre-judgment interest, attorneys' fees, and grant such other and further relief that the Court may deem appropriate.

IV. INSURANCE AGREEMENTS

This information sought by Rule 26(a)(1)(A)(iv) of the Federal Rules of Civil Procedures does not apply to Plaintiff.

ONTARIO JAJUANE LOGAN-PATTERSON,



By: _____
Counsel

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Danny Zemel
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dzemel@krudys.com
Counsel for Plaintiff Ontario Logan-Patterson

Certificate of Service

I hereby certify that on this 7th day of October 2024, I will send by email the foregoing to:

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